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Attorneys for Defendant Plain Green, LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SOVEREIGN BUSINESS SOLUTIONS
LLC and L. STEVEN HAYNES,

Plaintiffs,

v.

PLAIN GREEN, LLC,

Defendant.

Case No.: 2:19-cv-01035-JAD-NJK

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO RESPOND TO
COMPLAINT**

(FIRST REQUEST)

Plaintiffs Sovereign Business Solutions, LLC and L. Steven Haynes (“Plaintiffs”) and Defendant Plain Green, LLC (“Plain Green”) (collectively, the “Parties”), by and through their undersigned counsel, for good cause shown, hereby stipulate and agree to extend Plain Green’s deadline to respond to Plaintiff’s Complaint [ECF No. 4-1] to July 24, 2019.

1. Plain Green accepted service of the Complaint and Summons on May 23, 2019.
2. Plain Green filed a Petition for Removal on June 17, 2019 [ECF No. 1].
3. Plain Green's responsive pleading or motion is currently due June 24, 2019.
4. Plain Green requests additional time in order to adequately investigate and prepare its response to Plaintiffs' Complaint. The Complaint raises complex issues of law, including those referenced in the Petition for Removal, and Plain Green's response requires an investigation of alleged facts that occurred over five years ago, including alleged actions by individuals who are not currently officers, directors, employees, or agents of Plain Green.

5. On June 19, 2019, counsel for Plaintiffs agreed to the extension requested herein.
6. This extension request is sought in good faith and is not made for the purpose of delay.

Therefore, the Parties respectfully request an extension for Plain Green to file its responsive pleading or motion to and including July 24, 2019.

Dated: June 20, 2019

ARMSTRONG TEASDALE LLP

By: /s/ Brandon P. Johansson
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*Attorneys for Plaintiffs Sovereign Business
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Dated: June 20, 2019

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Attorneys for Defendant Plain Green, LLC

ORDER

IT IS ORDERED that Plain Green shall respond to Plaintiffs' Complaint on or before July 24, 2019.

DATED: June 21, 2019.

UNITED STATES MAGISTRATE JUDGE